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Attorneys for Defendants  
*Wells Fargo & Co. and*  
*Wells Fargo Bank, N.A.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JUAN CARLOS MERINO and AGUSTIN  
MOREL, JR., individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY, and  
WELLS FARGO BANK, NATIONAL  
ASSOCIATION,

Defendants.

Civil Action No.: 2:16-cv-07840-ES-MAH

**NOTICE OF DEFENDANTS' MOTION**  
**TO ADMIT LOUISA JOHNSON, ESQ.,**  
**PRO HAC VICE**

**PLEASE TAKE NOTICE** that, pursuant to Local Civil Rule 101.1(c) of the Local Civil Rules of the United States District Court for the District of New Jersey, the undersigned attorney for Defendants Wells Fargo & Company and Wells Fargo Bank, N.A. (“Wells Fargo” or “Defendants”) will move before the Honorable Esther Salas, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, at a date and time convenient for the Court, for an Order granting Defendants’ Application for *Pro Hac Vice* Admission for Louisa Johnson, a partner with the law firm of Seyfarth Shaw LLP, resident in its Atlanta office

(the “Motion”), to represent Wells Fargo in the above-captioned action in this Court. Counsel for Plaintiffs has consented to the *pro hac vice* admission of Ms. Johnson.

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, Defendants shall rely upon the Declaration of Robert T. Szyba, Esq. and Declaration of Louisa Johnson, Esq. A proposed form of order is also submitted.

Respectfully submitted,

By: /s/ Robert T. Szyba

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Attorneys for Defendants  
*Wells Fargo & Company and*  
*Wells Fargo Bank, N.A.*

Dated: March 18, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on March 18, 2019, I electronically filed the foregoing Notice of Defendants' Motion to Admit Louisa Johnson, *Pro Hac Vice*; Declaration of Robert T. Szyba, Esq.; Declaration of Louisa Johnson, Esq.; and Proposed Order, with the Clerk of the Court via the Court's CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Robert T. Szyba

Robert T. Szyba